

RACM Demolition Assessment Guidelines

Introduction

Revised 09-20-06

Before a hurricane damaged house can be demolished, the parish or Corps (Corps of Engineers) contractor must determine if the house contains RACM (Regulated Asbestos Containing Material).

If samples can be taken from the house, then this will determine if RACM is present. If samples cannot be taken, due to the house being unsafe to enter or structurally unsound, then the house is assumed to contain RACM. You will be performing assessments on houses that either tested positive for RACM or are assumed to contain RACM because samples could not be taken.

On your demo schedule (provided daily by the demo contractor), you will also see C & D demolitions listed. These properties either tested negative for asbestos or were “down by the storm” (meaning that no walls were left standing after the hurricane). In either case these are nonregulated demolitions, as are demolitions performed by a homeowner’s contractor or those performed by a volunteer group. We do not perform assessments on these types of demolitions.

Finding the Site

- Generally speaking, the demo schedule you receive will list the contractor’s crews and the order in which they will demolish their assigned houses. Just start with the first house assigned to the crew for that day.
- We will provide a contact list for the contractor that you are working. If you have trouble finding a crew, the best way to track them down is to call the contractor. If you don’t have a cell phone, let me know and I’ll monitor the DEQ radio (we’re on “Kenner-2”) in order to provide assistance if needed.
- At times you will arrive at a site only to find that the demolition has been held up due to equipment problems, broken gas or water lines, still connected power lines, etc. In these cases, move on to the next crew on your list rather than trying to “wait the problem out” at the site and return later in the day.

Arriving Onsite

- Before exiting the vehicle, make sure you are wearing proper PPE. This includes steel-toed boots, hardhat, wrap-around safety glasses (or glasses with side shields), and a Type 2 safety vest if working in a Corps run parish (Jefferson and Orleans Parishes). A Type 1 safety vest will suffice in St. Bernard and Plaquemines Parishes.
- Introduce yourself to the asbestos supervisor, the prime contractor representative, and the Corps Q.A. monitor (in Jefferson & Orleans) or the parish demo monitor (if in St. Bernard Parish). Note: The parish monitors in St. Bernard parish work for a private company called BBEC.
- Never cross the asbestos warning barrier tape and enter into the hot zone.

- Try to stay upwind while observing demolition activities.

The Hot Zone

- The containment area, or “hot zone”, must be taped off with asbestos hazard tape.
- The size of the hot zone will vary from contractor to contractor (we do not have the regulatory authority to determine the hot zone size).
- All persons actively engaged in the demolition of a RACM house must be accredited. Normally this will be the equipment operators, the asbestos site supervisor and his crew, and the person performing air monitoring at the site. Note: You may see nonaccredited individuals (truck drivers, FEMA archeologists, contractor personnel, etc.) in the hot zone during periods when the demolition is not in progress (lunch, breaks, etc.). This is OK. We are only interested in those individuals who are either performing air monitoring or who are working in the hot zone during the RACM phase¹ of the demolition.
- We do not regulate the use of PPE (respirators, Tyvec, etc.) or involve ourselves with safety issues at RACM sites. These are OSHA concerns.
- The “burrito wrap” should be completed in the hot zone.
- The asbestos warning (barrier) tape can be lifted up or untied to allow the trucks in or out of the containment area and should be replaced immediately afterwards.
- Once the hot zone has been set for the day, and the demolition has begun, the contractor cannot shrink the hot zone. Note: In Orleans Parish, the contractor will sometimes have a taped off “work zone” adjacent to the hot zone. This “work zone” (sometimes just used as a barrier to keep people away from the site) can be adjusted as the contractor sees fit.
- RACM debris may be left onsite overnight if the RACM is wetted and covered with visqueen that has been secured in place. The barrier tape must also remain in place around the hot zone and the site must be first on the list to be worked the next morning.

Asbestos Accreditations

- Hot zone workers (the site asbestos supervisor, his crew, and the equipment operators), and the individual performing air monitoring, must have their DEQ Certificate of Accreditation² (or a copy) and a photo ID, or their DEQ accreditation photo ID³ (or a clear copy), onsite. You need to check each of the above individuals for these documents.
- In the case where a copy of the DEQ certificate of accreditation is used as proof of accreditation, be sure to check a photo ID to insure the individual’s identity.

¹ Once all of the RACM debris (i.e., all of the debris associated with the house) has been removed from the site, then any remaining material is considered C & D debris and our RACM rules do not apply. This being said, in sector 2 of Orleans Parish (sites South of I-10) the Corps & ECC (the prime contractor) have elected to treat the remaining debris as RACM and as such must follow our RACM guidelines.

² See page 10 for a copy of a DEQ certificate of asbestos accreditation certificate.

³ See page 11 for a copy of a DEQ accreditation photo ID card.

Always ask for a driver's license or some other government issued ID. If this isn't available, I've also accepted photo IDs that were issued by the organization that provided the individual's asbestos training.

- Air monitors and asbestos supervisors are required to have proof of their contractor/supervisor accreditation onsite. Their accreditation # will contain "S", as in 7S01194. Note: An asbestos supervisor may supervise more than one site as long as they are adjacent to each other. In some cases you may find that the person performing the air monitoring, or the equipment operator, is also acting as the asbestos supervisor. This is permitted as long as he has the DEQ contractor/supervisor accreditation, stays on site during the demolition, and is actually supervising the hot zone.
- Other hot zone workers need to have, at the least, a worker accreditation. A worker accreditation # will contain "W", as in 7W01192. In some cases you will find that these people will have a contractor/supervisor accreditation, but are just employed as hot zone workers. This is acceptable.
- Be sure to check the equipment operators for proof of accreditation. Often, the asbestos supervisor will not have proof of their accreditation as the equipment operators normally work for a different subcontractor.
- A hose operator may be nonaccredited as long as he remains outside the hot zone while demolition activities are taking place. If this is the case, look to make sure that the debris is being adequately wetted as it may be hard to reach all areas of the demolition from outside of the hot zone.
- Do not rely on a contractor provided showing that they have checked onsite accreditations. I have found these lists to be incorrect in the past.
- You have the right to inform site personnel that they cannot work in the hot zone if nonaccredited, however, you don't have the authority to shut down a demolition.
- If an individual, who initially cannot provide proof of accreditation, can provide proof of accreditation before you leave the site, then this will suffice as proof of onsite accreditation. This may occur when a supervisor accidentally leaves the site with a workers proof of accreditation. Note: At this stage of the game every body should be well aware of our accreditation requirements, so don't spend any extra time waiting for "proof" to show up on the site.
- If you find a nonaccredited worker onsite, note this in the FIF (Facility Interview Form) and include the individuals name and his job at the site (hot zone worker, equipment operator, etc.). Also note on the FIF if you observed the individual working in the hot zone and include the names of onsite personnel with whom you discussed the Area of Concern. Note: In the Corps run parishes (Jefferson & Orleans) always be sure to discuss the Area of Concern with the onsite Corps Q.A. monitor and document same.
- Becky Barbier and Claudia Rush (both at DEQ Headquarters) are in charge of issuing asbestos accreditations. If a contractor has accreditation questions, Becky can be reached at 225.219.0932 and Claudia at 225.219.3179.

Air Monitoring

- Air monitoring is not a DEQ requirement. Ask if it is being performed and, if it is, check to make sure the person performing the monitoring has a contractor/supervisor accreditation from the DEQ (our only requirement concerning air monitoring). Note: You will not see air monitoring taking place at every RACM site. Once a contractor has accumulated thirty days of historical data showing “under the limit” asbestos fiber counts, OSHA may suspend air sampling requirements. For our purposes it is sufficient to just note whether this activity is taking place at the site.

Rolling on RACM Debris with Heavy Equipment

- Never permissible (well...almost, see below) without prior approval from Mickey Drury. Mickey can be reached at 504.736.7712 (office) or 985.373.7481 (cell). Note: If a contractor has permission to roll on RACM at a site you will be informed of this when you get your morning assignment. If a contractor tells you that he’s gotten permission to roll on RACM and this is the first you’ve heard of the variance, then chances are that they didn’t get permission from the DEQ.
- The one exception to the above rule; a bobcat with rubber tires/treads can roll on asbestos containing floor tile that is still fixed in place on a slab. Otherwise, a bobcat equipped, as described above, cannot roll on RACM.
- If heavy equipment is observed rolling on RACM⁴, then you should write on the FIF that the “excavator (bobcat, skid-loader, etc.) was observed rolling on RACM debris at the site”. Discuss the issue with onsite personnel (asbestos supervisor, prime contractor representative and Corps Q.A. monitor or parish monitor, if applicable) and document same (be sure to get the names).
- If possible, try to get a picture of the heavy equipment on top of the RACM debris.

Recycling of Non-RACM Debris

- The salvaging of materials, incidental to a RACM demolition, has long been recognized as a good practice to conserve landfill space and recycle usable material. In order to qualify as non-RACM, the material has to pass a visual inspection. If no suspect material is visually detected, it can then be reused. So far, this issue has only been raised twice. In one case a homeowner who wanted to save the pilings that his house was built upon and the other case involved a homeowner who wanted to salvage some cypress beams. If a contractor question arises about the recycling or salvage of materials on a RACM demolition site, please call Mickey.

⁴ See page 12 for pictures of heavy equipment rolling on RACM debris.

Wetting of Debris

- The structure must be wetted down before and during the demolition. The exception being when the structure is already sufficiently wet due to rainfall.
- The excavator/bobcat should not be working unless someone is manning the water hose, ready to spray water if necessary.
- If two pieces of equipment are working, then two water hoses may be needed to ensure adequate control of dust emissions.
- If there are dust emissions⁵, then wetting is not adequate. The criterion is no visible emissions. If emissions are observed, then you should write in the FIF that “dust emissions were observed rising from the RACM debris during the demolition of the house”. Also note whether the emissions were observed leaving the hot zone and document your discussions with onsite personnel about the Area of Concern. Note: In the Corps run parishes (Jefferson & Orleans) always be sure to discuss the problem with the onsite Corps Q.A. monitor and document same.
- If possible, try to get a picture of the dust emissions.

The Burrito Wrap

- You must wait for the loaded trailer to leave the hot zone before checking the burrito wrap.
- The idea is to create a leak-tight bag⁶ that will slide out of the truck in one piece at the landfill. Currently, all of the RACM debris being generated in Jefferson, Orleans, Plaquemines, and St. Bernard Parishes is being sent to River Birch Landfill in Jefferson Parish.
- Our regulations require that the plastic used for the burrito wrap be transparent or clear. The reason for this is that once the RACM is sealed in the burrito wrap, evidence of adequate wetting is considered to be the formation of water droplets on the inside of the wrap. As such, the plastic should be clear enough to observe these water droplets. This being said, some of the plastic that you will see the contractors using has a noticeable white tint and the plastic could be described more as opaque rather than clear. While out in the field don’t make an issue of the plastic’s transparency unless the plastic is a solid color, such as white or black. As a test, if you lay single layer of plastic over your hand and can still see your hand, then the plastic meets our requirements.
- DEQ does not regulate poly thickness. We only care that the burrito bag retains its integrity during its trip to the landfill.
- The poly cannot be glued to the side of the truck or taped to, or over, the center crossbar of the trailer. Note: Center crossbars are only found in the large eighteen wheeler “type” trailers.
- The contractors will use either custom manufactured drop in plastic bags or will “make” a bag in the trailer by using two or more separate pieces of plastic. If the

⁵ See page 13 for pictures of dust rising from RACM debris.

⁶ See page 14 for a picture of a good burrito wrap

bag is made from separate pieces of plastic, the bottom and corner seams of the bag must be sealed in order to form a leak-tight container. This is usually accomplished through the use of tape and/or glue.

- A generator label, preferably written with an indelible marker directly on the plastic, and an asbestos warning label must be applied to the top of the burrito wrap. The generator label must state the origin of the debris (Ex: Corps/ECC), the address of the demolition site, and the date. Note: Our regulations do not specify any standards for the generator label other than the information required. As such, the generator information may be hand written on a sheet of paper and attached to the burrito wrap. The asbestos warning label should be an OSHA approved tri-color sticker (usually black, red, and white). Without getting into the OSHA standards, if the warning sticker is a tri-color commercially supplied product, consider it to be adequate. Also, the asbestos warning sticker may have blanks for the generator label information. If these blanks are filled in with the proper information, a separate generator label is not needed. In Orleans and St. Bernard parishes, the generator label and/or asbestos warning label can be found on the top of the burrito wrap in the front/left quadrant of the loaded trailer (the corner closest to the driver).
- Before checking a burrito wrap, ask the asbestos supervisor if the truck is “ready to leave the site”. This way, if we find a problem, the contractor cannot say that we checked the truck before they were finished with it. Just be sure to document the conversation in the FIF.
- When checking a burrito wrap, you want to make sure that there are no visible openings in the top of the burrito wrap and that the debris (pipes, 2X4s, etc.) is not sticking-up out of the trailer in a way that might puncture the wrap while in transit. Normally a burrito wrap can be fixed by the crew if there are problems with the wrap, the exception being a burrito wrap where the plastic was not sealed where it overlaps in the corners of a trailer. In this case the burrito wrap cannot be fixed without dumping the load (back onto the RACM site), relining, and reloading the truck. You have the authority to make this call. Just be sure that the corners of the burrito wrap were not sealed. The best way to determine this is to watch a trailer being lined, as it can be hard to determine if the corner seams have been sealed when looking into a loaded trailer.
- In the Corp. run parishes (Jefferson & Orleans) do not climb directly on the loaded trailers. Ask site personnel for an appropriate size ladder and a spotter. You might be asked if it’s OK for a partially loaded RACM trailer to be moved to another site without burrito wrapping the load. Unless the sites are within sight of each other, the RACM must be properly wrapped.
- If possible, try to get a picture of the defective burrito wrap.
- Discuss the Area of Concern with onsite personnel and document same in the FIF.

ADVF

- Copy the number. There is one number per contractor, per parish, per day. This is a rolling number used to track the load(s) at the landfill. The onsite asbestos supervisor should be able to provide this number. Other than noting the ADVF (Asbestos Demolition Verification Form) number on the checklist, do not spend any time on this issue.

Debris Management

- While observing the demolition, make sure that the contractor is removing HHW (household hazardous waste), EW (electronic waste), white goods (household appliances), tires, & gasoline powered equipment (if these items are present). Note: The contractor should not be crushing, or rolling over, refrigerators or room air conditioning units. Doing so could result in the release of Freon.

Paperwork

- FIFs need to be filled out if any Areas of Concern are found at the demolition site. This includes problems or issues that are corrected during the site visit. This is important in order to get an overall view of how a contractor is performing and so that the prime contractor and /or the Corps are aware of Areas of Concern.
- See page 20 for details on how to fill out a FIF. Before you leave the site, have the asbestos supervisor sign the FIF and give him the yellow copy.
- Complete one 214 for the entire day. See page 15 for a copy of a properly filled out 214.
- A checklist needs to be completed for each active site. If you arrive at a site and the work is complete, or it is a C & D demo, make a note of the site visit on the 214 but do not complete a checklist.
- Please be sure to fill in all of the blanks on the checklist, including the name of the town or city that the demo is occurring in. In St. Bernard Parish, you can ask the demo crew for the “city” information (this information should be on the demolition site paperwork).
- If a checklist item is not applicable, make a note why. For example, write “no trucks on site” for not checking off the block addressing placing debris in visqueen.
- Two copies of the 214, checklist, and FIF (if used) are needed for each assessment performed (please staple each set). Two copies go to Kevin Cousins and the original goes into the black box on Phyllis Luke’s desk (in SERO). The exceptions being those BR surveillance personnel who are turning in their originals to Sheri Courtney and SERO surveillance personnel who turn the originals into their supervisors.
- Please turn in your paperwork by the following workday. If you aren’t coming in, then please fax (504.736.7702) or email copies to Kevin Cousins.

- For those of you who prefer to type their reports; let me know and I'll send you electronic copies of the check lists and the 214.

TEMPO Entry Guidelines

- After opening TEMPO, double click on "select agency interest".
- Enter the Agency Interest # from the checklist and double click on "Find Records".
- When the agency interest information appears on the screen, double click on "OK".
- Double click on "Create New Document". A "Create Document" pop-up box will appear on your screen at this time.
- See page 16 for an example of how to fill out the "Create Document" pop-up box.
- Next you need to select the "Set/View" type. To do this click on "agency" (on the tool bar) and then "Compliance- Set/View Type" in the drop down box. "KATRINA- related" should then be selected for the set/view type.
- Once the above is down, highlight your inspection document and click on the "Check Out" box. Once the document is checked out, you can now double click on the inspection document to open up the description tab.
- See page 17 for a properly filled out "Description" tab. Note: The Checklist/Nonchecklist" tab is not used for Demo Assessments.
- Check your report back in by clicking on the "Check In" box.
- Next highlight the "Work Activity Log" that's associated with your report and check out same.
- Complete the work activity log as shown on page 18. Note: Phyllis Luke will lock this document
- Check the "Work Activity Log" back-in and you are now finished.
- Please be sure to make your TEMPO entries. If you don't, you can expect a call or email from Phyllis Luke.

Transmittal Sheet Preparation Guidelines for SERO Personnel

- See page 19 for a properly filled out transmittal sheet.
- For inspectors from other regions, Phyllis Luke will fill out the transmittal sheet after a final review of the document.

Miscellaneous

- You can find water and ice in our lab, while MREs can be found in the storage room located next to our lunch/break room.
- Be sure to leave your cell phone number or beeper number with Kevin Cousins or Anis Abdelghani so that we can contact you with possible changes in the day's schedule (we've had days when the demos get called off due to

rainouts, etc.) If you don't have a cell phone, let us know and we'll monitor "Kenner-2" on the state radio so that you can contact us with questions.

- Do not share contractor contact phone numbers with other contractors. I've been told that they will use this information to try to hire employees from the competition.
- Photos should be placed into a photo template and attached to the report (or e-mailed to me so that I can attach them to the report, if you're from out-of-town). Ask Kevin to email a photo template to you if needed.
- Try to hit one of the crews on your list twice in the same day. We don't want them to think that they're "home free" for the day after our initial assessment. Detail the second visit on the 214, but don't fill out a checklist unless you find a problem. Also, it won't be necessary to check the accreditations again unless you observe new personnel working at the site in the hot zone.
- If you're a weekend volunteer, we will provide you with a key card, for the day, so that you can drop off your reports on the way home.
- If you find an "Area of Concern" at a site, be sure to bring this to the attention of Kevin Cousins or Anis Abdelghani as soon as possible (we like to address these problems as quickly as possible).
- I have attached a copy of the DEQ emergency roadside procedures in case you have a breakdown; see page 21.
- You should be equipped with a box of disposable gloves for use when checking burrito bags in loaded trailers.
- Questions? Call Kevin or Mr. Anis first and then Mickey if necessary...our phone numbers are printed at the bottom of the Demolition Assessment Checklist.